

CONTINUATION IN SUPPORT OF
A COMPLAINT

I, Scott Robinson, being duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since 2019. I was previously employed as a police officer in Indiana for 9 years. I am currently assigned to the Detroit Division, Lansing Resident Agency. Since becoming a Special Agent, I have worked federal violations including kidnapping, child sex trafficking, online child exploitation, and child pornography.

2. My duties include the investigation of alleged violations of federal criminal laws, Sexual Exploitation of a Child (18 U.S.C. § 2251), and Receipt, and Possession of Child Pornography (18 U.S.C. § 2252A). As a result of my participation in this investigation, I submit that there is probable cause to believe that **JACOB DAVID GONZALEZ (GONZALEZ)**, committed these offenses.

3. The statements contained in this continuation are based in part on information provided by U.S. federal law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, including foreign law enforcement agencies; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent. Since this continuation is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation.

BACKGROUND TO THE INVESTIGATION

4. On November 27, 2023, GONZALEZ was identified as an internet user attempting to gain access to a website dedicated to the trading of child pornography. GONZALEZ was living at 2414 Creston Avenue, Lansing Michigan (SUBJECT PREMISES) located Ingham County in the Western District of Michigan.

5. On November 28, 2023, the U.S. District Court for Western District of Michigan authorized a search warrant (1:23-MJ-523) for the SUBJECT PREMISES. During the execution of the search warrant by the FBI, GONZALEZ was at the SUBJECT PREMISES with two of his five children, ages 7 and 10 years. GONZALEZ's five children are the following ages and genders: 4-year-old boy, 7-year-old boy, 8-year-old boy, 10-year-old boy, and 18-year-old boy.

6. The FBI collected multiple digital devices and took pictures of the interior of the house pursuant to the search warrant at the SUBJECT PREMISES. The forensic review of the digital devices is ongoing, but an initial review revealed evidence of the sexual exploitation of children, that is the production of child pornography, in violation of 18 U.S.C. § 2251(a); and the receipt and possession of child pornography in violation of 18 U.S.C. § 2252A(a)(2) and (a)(5)(B).

7. Specifically, in regards to production of child pornography, a Samsung, model SM-G78U, cellular telephone located at the SUBJECT PREMISES, with attributes to GONZALEZ, contained more than 250 images of naked pre-pubescent males, which the FBI assesses to be GONZALEZ's minor children, with their exposed genitalia appearing to be the intended focus of the images.

8. The images appear to have been taken in various rooms within the SUBJECT PREMISES, including the bathroom and family room. Forensic examination of the Samsung

cellular telephone and other digital devices is ongoing and, at this time, the exact dates that the images were produced are not known. However, according to county records, GONZALEZ purchase the SUBJECT PREMISES in October 2019. Therefore, I believe that GONZALEZ produced the child pornography images sometime between October 2019, when he purchased the SUBJECT PREMISES, and November 29, 2023, when the FBI executed the search warrant and seized the Samsung cellular telephone. The Samsung cellular telephone was manufactured outside of the state of Michigan.

9. One such image showed a male child urinating in the bathroom of the SUBJECT PREMISES with his penis and buttocks displayed. FBI agents identified a side profile of the boy's face as GONZALEZ's pre-pubescent son (hereafter identified as MV1¹). The SUBJECT PREMISES's bathroom has a distinct shower curtain, flooring, wall color, and bath rug combination assisting in the identification of multiple images of naked pre-pubescent boys stored on the cellular device.

10. Also located in the cellular device attributed to GONZALEZ was a collage of two images side by side. One image displayed a close-up image of a pre-pubescent male's exposed buttocks and scrotum with a blue patterned fabric in the background. The fabric appears consistent with a blue couch in family room of SUBJECT PREMISES. The skin around the buttocks was extremely red and agitated with thin raised welts, which appears consistent with an abusive injury. The second image in the collage was a pre-pubescent male without pants or underwear, standing in the identified bathroom at SUBJECT PREMISES. The pre-pubescent male's buttocks are exposed, but his genitalia not visible in the image due to the camera angle.

¹ MV1's full date of birth and address are known to me, but are not included here to protect his PPI.

11. All biological children of GONZALEZ were forensically interviewed. One child (hereafter identified as MV2²) stated he was spanked on his hands by GONZOLEZ but “mostly on the tush.” GONZALEZ used his hand when he spanked MV2 but has also used a “charger” from the car.

12. Based upon my review of the collage image described above, and the statement of MV2, I believe that GONZALEZ spanked one of his prepubescent sons with his hand and also used a charger cord and produced a picture of the reddened buttocks. In my knowledge and training and in the knowledge and training of others, images of a reddened buttocks that has been spanked is a sexually explicit image depicting the results of a sadistic or masochistic acts.

13. MV2 also talked about a time in March or June of 2023, when he walked by the bathroom at SUBJECT PREMISES while MV1 was in the shower and saw GONZALEZ in the bathroom as well. GONZALEZ was fully clothed but stood right by the shower. The shower curtain was closed, but GONZALEZ was making weird faces and unusual noises.

14. Additional review of the cellular device attributed to GONZALEZ revealed receipt of child pornography through messaging on a mobile application called Telegram, a cloud-based messaging service allowing users to exchange messages, share media and files, and hold private and group voice or video calls. GONZALEZ received several images and videos via Telegram, including the following media files:

- a. File name: -5050961895095380796_120.jpg was image of a pre-pubescent female under the approximate age of 12 years old with her genitalia exposed.

² MV2’s full date of birth and address are known to me, but are not included here to protect his PPI.

- b. File name: -620388373041411990_121.jpg was image of a pre-pubescent female under the approximate age of 12 years old with her genitalia exposed.
- c. File name: 1_5030592389467603642.mp4 was a 54-second video of an adult penis being forced into the mouth of an infant.
- d. File name: 1_5030592389467603652.mp4 was a 42-second video of an adult male anally penetrating an infant.
- e. File name: 5_6203929355396058074.mp4 was a 22-second video of an adult male anally penetrating an infant.

15. The Samsung cellular telephone also contained in excess of 187 images and 15 videos of probable child pornography, including the files referenced in paragraph 14.

CONCLUSION

16. Based on the forgoing, I submit that there is probable cause to believe that **JACOB DAVID GONZALEZ** sexual exploited minors by causing, inducing, using minors to produce child pornography, in violation of 18 U.S.C. § 2251(a); and received and possessed child pornography, in violation of 18 U.S.C. § 2252A(a)(2) and (a)(5)(B).